

1 Mark R. Figueiredo, Esq. (Cal. SBN 178850)  
2 Ethan G. Solove, Esq. (Cal. SBN 308026)  
3 Austin T. Jackson, Esq. (Cal. SBN 317538)  
4 STRUCTURE LAW GROUP, LLP  
5 1754 Technology Drive, Suite 135  
San Jose, California 95110  
Telephone: (408) 441-7500  
Facsimile: (408) 441-7501  
6 Attorneys for Defendants  
INDYZEN, INC. and PRAVEEN NARRA KUMAR

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

10 PARKRIDGE LIMITED, a Hong Kong  
11 corporation, by Mabel Mak, and MABEL MAK,  
an individual.

Case No. 4:16-cv-07387-JSW

## JOINT STATUS REPORT

Date: October 10, 2018  
Time: N/A  
Dept.: N/A  
Judge: Hon. Jeffrey S. White

12 Plaintiffs,  
13  
14 v.  
15 INDYZEN, INC., a California corporation,  
16 PRAVEEN NARRA KUMAR, an individual  
Defendants.

18        The Parties respectfully submit the following Joint Status Report pursuant to Docket 24 in the  
19 above captioned case. The above-captioned case is stayed pursuant to the April 18, 2017 Order. Dkt.  
20 24, at 9-10. The Parties are participating in arbitration pursuant to the Court's Order, which is  
21 currently pending.

### Defendants' Statement Only

23 On April 13, 2018, the Court ordered Randy Dobson, California Management Group a/k/a  
24 CMG.Asia, California Fitness & Yoga Centers, F8 Vietnam Company Limited, and Boon Global  
25 Limited (the “Additional Cross-Respondents”) “to join the related arbitration for this case in order that  
26 the arbitrator may decide whether to allow counterclaims against them proceed.” On April 25, 2018,  
27 the Arbitrator issued an order allowing the counterclaims against the Additional Cross-Respondents  
28 to proceed, and the Arbitration has been continuing with them as well as the Plaintiffs and Defendants

1 ever since. On July 30, 2018, the Arbitrator issued an order denying the Additional Cross-  
2 Respondents' motion to dismiss in its entirety.

3 The Parties are currently in the discovery phase of the Arbitration, with percipient witness  
4 depositions ordered by the Arbitrator to be wrapped up by the end of October and expert witness  
5 depositions to be wrapped up by the end of November. An evidentiary hearing is scheduled for late  
6 January.

7 Plaintiffs' Statement Only

8 Plaintiffs believe that Defendants' separate statements and characterizations are unnecessary,  
9 and are nevertheless inaccurate and incomplete. While Defendants state that the Arbitrator's April  
10 25, 2018 order "allow[ed] the counterclaims . . . to proceed," the Arbitrator actually ruled that the  
11 Additional Cross-Respondents are entitled to formal notice and an opportunity to raise jurisdictional  
12 objections and defenses. Indeed, the Arbitrator has stated that he will revisit Defendants'  
13 counterclaims.

14  
15 DATED: October 10, 2018

Respectfully submitted,

16 By: /s/ Adam Wolek

17 Adam Wolek (*pro hac vice*)  
18 Taft Stettinius & Hollister LLP  
19 111 E. Wacker Drive, Suite 2800  
20 Chicago, Illinois 60601-3713  
21 Tel: 312.836.4063  
22 Fax: 312.966.8598  
23 awolek@taftlaw.com

24  
25  
26  
27  
28 LAW OFFICES OF DAVID A. MAKMAN  
29 David A. Makman, SBN 178195  
30 david@makmanlaw.com  
31 Attorneys for PLAINTIFFS

DATED: October 10, 2018

Respectfully submitted,

STRUCTURE LAW GROUP, LLP

By: /s/ Ethan G. Solove

Ethan G. Solove, Esq.  
Email: ESolove@structurelaw.com  
Attorneys for DEFENDANTS